
INTRODUCTION

Missouri's Operating Permits Program includes two types of operating permits. These are the *Part 70* operating permits and the *Basic State* operating permits. The rule includes the *Part 70 Operating Permit* for "Major Sources," which satisfies the requirements of Title V of the 1990 Clean Air Act Amendments as set forth by the United States Congress to supplement the Clean Air Act. As a subtype of the Part 70 permits, the rule includes provisions for an *Intermediate Operating Permit* for those "Major Sources" which choose to volunteer for self-imposed emission limitations so a Part 70 permit is not required. Finally, the rule includes provisions for the *Basic Operating Permits* for sources which are not classified as "Major Sources." This rule is set forth at MISSOURI STATE RULE 10 Code of State Regulations (CSR) 10-6.065 Operating Permits.

These instructions include guidance to help you determine which classification (or type) of operating permit you will be required to obtain.

Sources which are required to obtain an operating permit under 10 CSR 10-6.065 must complete all or part of the attached application forms. All applicants must:

1. Submit duplicate copies of the application.
2. Submit \$100.00 application fee.
- 2a. If submitting application to one of the local agencies (i.e., Kansas City, Springfield, City of St. Louis or St. Louis County) please send \$100.00 application fee to Missouri Department of Natural Resources, Air Pollution Control Program with copy of the OP-A01 form.
3. Provide completed forms OP-A01 and OP-A02.
4. Provide a completed Applicable Requirements Checklist (Form OP-A03)
5. Provide a completed Application Checklist (Form OP-F02).
6. All signatures must be original (no copies) and signed in ink.
7. When required, provide a completed Emissions Inventory Questionnaire (EIQ) for the calendar year ended December 31.

Applications are incomplete unless all information requested is supplied. Failure to supply any additional information requested by the permitting authority may result in the denial of the permit application, and loss of the *application shield*.

A copy of Title 10, Division 10 Missouri Air Laws and Regulations can be obtained by contacting the Secretary of State's Office at (573) 751-4015. The cost for the copy is \$25.00.

If you need assistance or have further questions, contact:

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| ● Missouri Dept. of Natural Resources
Air Pollution Control Program
Operating Permit Unit
P.O. Box 176
Jefferson City, MO 65102-0176
Telephone: (573) 751-4817
Fax: (573) 751-2706 | ● Technical Assistance Program (TAP)
(800) 361-4827 |
| | ● Missouri Dept. of Natural Resources
regional offices |
| | ● The appropriate local agency |

Completed applications must be mailed to the above address (Do not fax applications). However, if the facility for which you are submitting an operating permit application is located in the cities of Kansas City, Springfield, or St. Louis, or the county of St. Louis, you will submit your operating permit application to the respective local agency.

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Local Agency Addresses:

City of St. Louis:
Division of Air Pollution Control
1220 Carr Lane Avenue
St. Louis, MO 63104
Telephone: (314) 664-7877
Fax: (314) 664-7933

St. Louis County:
St. Louis County Department of Health
Air, Land & Water Branch
Air Pollution Control Section
111 South Meramec
Clayton, MO 63105
Telephone: (314) 854-6923
Fax: (314) 854-6951

City of Springfield:
Air Pollution Control Authority
227 East Chestnut Expressway
Springfield, MO 65802
Telephone: (417) 864-1662
Fax: (417) 864-1499

Kansas City:
Kansas City Health Department
Air Quality Section
2400 Troost
3rd Floor
Kansas City, MO 64108
Telephone: (816) 983-4301
Fax: (816) 983-4475

Regional Office Addresses:

Jefferson City Regional Office
1511 Christy Drive
P.O. Box 176
Jefferson City, MO 65102-0176
Telephone: (573) 751-2729
Fax: (573) 751-0014

Kansas City Regional Office
3800 South Elizabeth Avenue, Suite G
Independence, MO 64057-2652
Telephone: (816) 795-8655
Fax: (816) 795-8755

Northeast Regional Office
1409 Prospect Drive
Macon, MO 63552-1930
Telephone: (816) 385-2129
Fax: (816) 385-6398

Southeast Regional Office
948 Lester Street
P.O. Box 1420
Poplar Bluff, MO 63901-1420
Telephone: (573) 840-9750
Fax: (573) 840-9754

Southwest Regional Office
2040 W. Woodland
Springfield, MO 65807-5912
Telephone: (417) 891-4300
Fax: (417) 895-4399

St. Louis Regional Office
10805 Sunset Office Drive
St. Louis, MO 63127-1017
Telephone: (314) 822-0101
Fax: (314) 822-0943

SECTION A - GENERAL APPLICATION INFORMATION

FORM OP- A01, "GENERAL APPLICATION INFORMATION"

Form OP - A01 requests the general plant information and other related information for the facility subject to this specific permit application.

A.1 - Enter the general plant information for the facility.

- For the Missouri senatorial and representative district numbers, see the table provided in the Appendix. Choose the senatorial and representative district numbers based on the physical location of facility (street address).
- Geographical location information (Quarters, Section, Township, Range) can be obtained from your property title or by contacting the county assessor's office in the area of your facility.

A.2 - Complete if applicable.

A.3 - Determining Applicability of the Operating Permit Program

The Missouri operating permit program consists of a two level permit program. Classification into a particular operating permit level depends on your facility's potential to emit. If you are a Part 70 facility, you can choose to obtain an Intermediate operating permit rather than a Part 70 permit.

- Part 70 (Title V)
 - Intermediate (Synthetic Minor)
- Basic State

In determining applicability of the operating permit program to your facility, only calculate the potential to emit for the possible "limiting pollutant;" the pollutant with the highest emissions from the facility with respect to Part 70 applicability thresholds. Be careful to note all the thresholds for all pollutants emitted by your facility. Hazardous air pollutants have relatively low annual emission thresholds, and can easily be overlooked when performing an initial assessment of a facility.

For example, you are tasked with determining if your facility needs a Part 70 permit. The primary pollutant emitted is particulate matter; the facility also emits other criteria pollutants in lesser amounts. Only calculate the potential emissions of particulate matter (PM₁₀) from your facility to address applicability of the Part 70 program. Do not spend the time and resources calculating Potential to Emit (PTE) for the other emissions.

Potential to Emit, PTE

Potential to emit is a means of comparing, for various source categories, sources of air pollution and for determining, for those source categories, whether the agency should be concerned (expressed through enforcement, permitting, and other agency activities) with the source. It is the best means currently available for putting dissimilar sources of air pollution on the same basis of review and concern, without regard to the particular category the source belongs to. Potential emissions at a facility shall be calculated based on the maximum annual-rated capacity of the installation, assuming continuous year-round operation. Federally enforceable permit conditions limiting the type of materials combusted, or processed, operating rates, hours of operation or the application of air pollution control equipment shall be used in determining the annual potential.

A federally enforceable condition is any limitation or condition which is enforceable by the administrator. It includes all New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPs), and Hazardous Air Pollutant (HAP) requirements, requirements within the state implementation plan (SIP), any Prevention of Significant Deterioration (PSD) or non-attainment review permits, and any existing construction or operating permits.

SECTION A - GENERAL APPLICATION INFORMATION

Since the construction permit rules are approved by the EPA as part of the Missouri SIP, limits on emissions, production, or the operation used to calculate construction permit emission limits are enforceable by the EPA. Note: the operating permit program does not replace the federal/state construction permit program for new and modified sources.

Example: Your facility has two boilers. One was built in the 1950's and has not been modified. The boiler is only used occasionally throughout the year. The second was built in 1987 and obtained a construction permit limiting annual boiler hours to 5000. The potential to emit calculation for the first boiler will involve multiplying an emission factor by 8760 hours per year. The second boiler's calculation will multiply an emission factor by 5000 hours per year. Even though the first boiler does not run 8760 hours per year there are no federally enforceable permit conditions restricting the boiler from operating year round, therefore the potential to emit calculation must be evaluated based on continuous operation. Since the second boiler has a construction permit, any restrictions in the permit can limit the unit's potential to emit.

Exempt activities, listed in the Appendix, are not required to be included in potential to emit calculations. Insignificant activities as identified on Form OP-C01 are not included in the potential to emit calculations. Insignificant activities as identified on Forms OP-C02 and OP-C03 must be included in potential to emit calculations.

Potential to Emit Guidance

In calculating potential emissions, you may consider "inherent physical limitations" in your potential to emit calculations. In other words, emissions which are constrained by process limitations rather than "maximum capacity" of the unit; and process bottlenecks are considered "physical limitations" when calculating potential to emit.

For example, a paint spray gun has the potential to spray paint 8760 hours per year. However, the process which the spray gun supports, can paint at a maximum, only ten widgets per hour. Instead of basing VOC and HAP potential emissions on a 8760 hour operation, the potential emissions can be based on the amount of paint it takes to paint ten widgets per hour annualized.

In calculating potential emissions from emergency generators, you may use 500 hours of operation annually for emergency generators whose sole function is to provide backup power. Be aware that an "emergency generator" is a generator whose sole function is to provide back-up power when electric power from the local utility is interrupted. It does not apply to peaking units at electric utilities, generators at industrial facilities that typically operate at low rates but are not confined to emergency purposes, and it does not apply to any standby generator that is used during time periods when power is available from the utility.

For particulate emissions, be aware that the definition of regulated air pollutant under the operating permit program applies only to emissions of PM_{10} (particulate matter with an aerodynamic diameter of less than 10 microns) not total suspended particulates (TSPs).

Treatment of Fugitive Emissions

Fugitive emissions, defined as those which cannot reasonably pass through a stack or vent, are not required to be counted in determining operating permit applicability. However, if the source is within one of the 26 named source categories (10 CSR 10-6.020(3)(B)), or is in a source category regulated by an NSPS or NESHAP requirement that underwent special rulemaking relating to counting fugitive emissions, **then fugitive emissions must be counted**. In general if the fugitive emissions occur within a building, they must be counted.

SECTION A - GENERAL APPLICATION INFORMATION

MDNR's current interim policy, subject to future rule revision, says fugitive emissions do not have to be counted if an applicable NSPS or NESHAP requirement was not promulgated by EPA before August 7, 1980.

For example, Subpart OOO, New Source Performance Standard for Non-Metallic Mineral Processing Plants, was promulgated in 1985. Therefore, under the interim policy, non-metallic mineral processing plants do not include fugitives in potential to emit calculations. (Fugitive emissions from these sources must be listed in the application and included in the EIQ.)

The above mentioned method for treating fugitive emissions in PTE calculations only applies when determining Part 70 applicability. For Basic State applicability determination fugitive emissions must be included in the PTE calculations. The emission limit established in an intermediate operating permit application must include fugitive emission only if the installation is required to count fugitive emission in their PTE calculation (Part 70 Applicability).

All fugitive emissions of hazardous air pollutants are included in the potential to emit calculation.

Part 70 Applicability

The purpose of a Part 70 permit is to consolidate all air emission information into a single document. The permit will serve as a single enforcement document for regulators. A Part 70 permit is required for your facility if any of the following apply.

- a) Your facility has potential emissions which are greater than 100 tons per year of any criteria pollutant (**major source**). Refer to Appendix for a list of criteria pollutants. Note that for operating permit applicability purposes, TSP is not a regulated/criteria pollutant.
- b) Your facility is in an area which is classified as non-attainment area. Non-attainment areas may have substantially lower "major source" thresholds, depending on the *classification* of non-attainment area.

Area Non-attainment Classification	Potential Annual Emissions
Marginal	100 tons per year
Moderate	100 tons per year
Serious	50 tons per year
Severe	25 tons per year
Extreme	10 tons per year

Currently the St. Louis area is classified as a *moderate* non-attainment area, which means the major source thresholds are identical to those for sources in an attainment area. If the St. Louis area is redesignated as a *serious* non-attainment area, the major source thresholds for VOC and NO_x will fall to 50 tons per year. It is expected that the MDNR will apply for and receive a NO_x exemption which will allow the NO_x threshold to remain at 100 tons per year. The VOC threshold will fall to 50 tons per year. Facilities in the St. Louis non attainment area should keep this in mind when determining operating permit program applicability, especially if the Intermediate program is being considered.

- c) Your facility has potential emissions which are greater than 10 tons per year of any individual hazardous air pollutant. Refer to the Appendix for a list of the hazardous air pollutants.

SECTION A - GENERAL APPLICATION INFORMATION

- d) Your facility has potential emissions which are greater than 25 tons per year of any combination of hazardous air pollutants. Refer to the Appendix for a list of the hazardous air pollutants.
- e) Your facility is subject to a standard under section 111 of the Clean Air Act.

Section 111 corresponds to the New Source Performance Standards (NSPS) found in 40 CFR Part 60. The NSPS standards are established for new stationary sources of air pollution which "... may contribute significantly to air pollution which causes or contributes to the endangerment of public health or welfare." The Act requires that standards of performance for such sources reflect "... the degree of emission limitation achievable through the application of the best system of emission reduction which (taking into account the cost of achieving such reduction) the Administrator determines has been adequately demonstrated."

The standards apply only to stationary sources, the construction or modification of which commences after regulations are proposed by publication in the federal register. The New Source Performance Standards are adopted by reference in 10 CSR 10-6.070. Refer to the Appendix for a list of NSPS and a list of air pollutants regulated under NSPS.

- f) Your facility is subject to a standard under Section 112 of the Clean Air Act.

Section 112 corresponds to the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) and the Hazardous Air Pollutant (HAP) requirements developed under 40 CFR Part 61 and Part 63. The NESHAP are adopted by reference in 10 CSR 10-6.080. Refer to the Appendix for a list of pollutants regulated under Section 112.

The Appendix also contains a list of pollutants regulated under section 112(r), accidental release of certain hazardous air pollutants. A source is not required to obtain a Part 70 permit solely because it is subject to rules or requirements under section 112(r) of the Act.

Part 61 NESHAPs

The NESHAPs program was established in the 1970 Clean Air Act Amendments when Congress first recognized that there were other pollutants, beyond the six criteria pollutants, which caused serious environmental and health impacts. In order for a NESHAP standard to be promulgated, EPA was required to prove that a specific pollutant posed a significant risk to public health nationally. This requirement led to years of litigation for each pollutant or source category which ultimately was regulated. As a result, EPA has promulgated rules for only seven pollutants and few source categories.

Refer to the Appendix for a list of the pollutants for which standards have been promulgated. A source is not required to obtain a Part 70 permit solely because it is subject to 40 CFR 61.145, Emission Standard for Asbestos Demolition and Renovation.

Part 63 NESHAPs

The standards developed in Part 63 are referred to as Maximum Achievable Control Technology (MACT) standards. MACT is designed to require the maximum achievable degree of reduction of hazardous air pollutant emissions from major stationary sources with consideration of the economic, environmental, and energy impacts of the control strategy. Refer to the Appendix for a list of categories of sources of HAPs and schedule for issuing MACT standards.

SECTION A - GENERAL APPLICATION INFORMATION

- g) The facility is an affected source under Title IV (**acid rain**).

An affected source is any source which includes one or more emission units subject to emission reduction requirements or limitations contained in Title IV of the Act. The purpose of Title IV is to reduce acid deposition (acid rain) through nationwide reductions in annual emissions of sulfur dioxide and nitrogen oxides. The reduction for sulfur dioxide will total 10 million tons per year, and for nitrogen oxides will total approximately 2 million tons per year. **This primarily affects large utility company boilers.**

- h) The facility has a solid waste incinerator subject to Section 129(e) of the Clean Air Act
- I) Other source categories may be designated by the administrator as a Part 70 source pursuant to 40 CFR 70.3

Missouri Deferral

Under federal rules, all sources which are subject to an NSPS, NESHAP, or MACT requirement must obtain a Part 70 operating permit. Missouri has chosen to defer the requirement that facilities obtain a Part 70 permit *for those facilities that would be Part 70 sources strictly due to the fact that they are subject to an NSPS, NESHAP, or MACT requirements.* These facilities will not be required to file for a Part 70 operating permit until November 15, 1999, or until the administrator subjects the installation to the requirements by rule. Section 112(r) sources are exempt. Refer to (f) above.

All such facilities must obtain a Basic State operating permit. While the requirement that the facility obtain a Part 70 permit has been deferred, the facility still must obtain a Basic State operating permit.

Intermediate Applicability

Facilities subject to Part 70 because of potential emissions may want to limit their potential emissions in order to avoid the Part 70 permitting requirements. Facilities that choose to limit their potential emissions to below the major source thresholds do so by filing an Intermediate operating permit application.

Potential to emit is commonly limited on the basis of type of material combusted or processed, operating rates or hours of operation. Any provision volunteered by the applicant in the permit application which is designed to limit an installations potential to emit will be federally enforceable. The voluntary provision must be at least as stringent as any other applicable limitation or requirement contained in the implementation plan or enforceable under the implementation plan and must be permanent, quantifiable and otherwise enforceable as a practical matter.

An owner or operator should seriously contemplate the decision of becoming an Intermediate source. After taking restrictions on potential to emit to become an Intermediate source, it could take up to 18 months to process a request to obtain a Part 70 operating permit if the owner or operator decided that they could not live with such restrictions. Owners or operators should not choose to become a “synthetic minor” unless they have evaluated the consequences. Each intermediate permit is subject to EPA review and public participation requirements.

After obtaining an Intermediate permit an owner or operator who decides that a Part 70 permit is required has two scenarios in which to increase the sources potential to emit: 1) use existing capacity or 2) construction or modification of the source. In the first case, an owner or operator could not increase emissions until a Part 70 operating permit was obtained, which may take up to 18 months. In the second case, an owner or operator could apply for a construction permit, receive permit, construct, operate for one year in accordance with the construction permit, then apply for a federal operating permit. Approval for a construction permit may take from 3 to 6 months to process.

SECTION A - GENERAL APPLICATION INFORMATION

An owner or operator of a federal operating permit program source who decides that they no longer want to be permitted under a Part 70 operating permit can apply for an Intermediate permit. The owner or operator must submit an Intermediate permit application in order to obtain restrictions on potential to emit before the Part 70 operating permit terms would no longer be applicable to the source.

Basic State Applicability

A Basic State operating permit is required for the following sources.

- a) Sources with existing potential emission greater than the de minimis levels but less than major source thresholds. Refer to the Appendix for a list of the de minimis levels;
- b) Sources with emission levels less than de minimis but with an incinerator (non solid waste incinerator) or asphaltic concrete plant;

An incinerator is defined as any article, machine, equipment, contrivance, structure or part thereof which is used to burn refuse or to process refuse material by burning other than open burning.

- c) Sources subject to a NSPS standard (111). These sources will be required to obtain Part 70 under the schedule outlined in Part 70 Applicability (**Missouri Deferral**).
- d) Sources subject to a NESHAP or other HAP requirement (112, or MACT). These sources will be required to obtain a Part 70 permit under the schedule outlined in Part 70 Applicability (**Missouri Deferral**). These sources are not required to obtain a Part 70 permit solely because they are subject to Section 112(r) of the Act.

A.4 - Check *Initial* if this is a first-time operating permit application for this installation. Check others as they apply.

A.5 - Applicant's certification statement must be signed by a Responsible Official.
A responsible official is:

- A. The president, secretary, treasurer or vice-president of a corporation in charge of a principal business function, or any other person who performs similar policy and decision-making functions for the corporation or a duly authorized representative of this person if the representative is responsible for the overall operation of one (1) or more manufacturing, production, or operating facilities applying or subject to a permit and either-
 - (I) The facilities employ more than two hundred and fifty (250) persons or have a gross annual sales or expenditures exceeding twenty-five million dollars (in second quarter 1980 dollars); or
 - (II) The delegation of authority to his representative is approved in advance by the permitting authority.
- B. A general partner in a partnership or the proprietor in a sole proprietorship.
- C. Either a principal executive officer or a ranking elected official in a municipality, state, federal, or other public agency. For the purpose of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the operations of a principal geographic unit of the agency; or

SECTION A - GENERAL APPLICATION INFORMATION

- D. The designated representative of an affected source insofar as actions, standards, requirements or prohibitions under IV of the Clean Air Act or the regulations promulgated under the Act are concerned and the designated representative for any purposes under Part 70. (10 CSR 10-6.020)

Applications without a signed certification will be returned as incomplete. **Signing this document has serious legal implications for you personally -- both civil and criminal. Before signing, you should be confident that the materials submitted are substantially correct and that your compliance with all requirements applicable to your facility are as stated.**

FORM OP - A02, "APPLICATION FOR AUTHORITY TO OPERATE"

For facilities with more than one principle product, a separate Form OP-A02 should be completed for each product.

Complete Facility Name, County Number, Plant Number and Year Submitted.

- A.6** - List your principle product(s) and the first two-digit(s) of your Standard Industrial Classification (SIC) code(s). SIC is a designation system by the federal government. For example, a facility that makes cardboard boxes has a two-digit SIC code of 26.
- A.7** - List any associated processes and their first two-digit SIC codes related to your principle product(s). For example, a cardboard manufacturer with a printing process will list printing SIC code 27.
- A.8** - Check the appropriate box. If you answered yes, complete Sections D.2 of Form OP-D03 of this application. **(See instructions for OP-D03)**
- A.9** - Check the appropriate box. If you answered yes, fill in the date of most recent EIQ submitted. If you answered no, submit two copies of the EIQ for previous calendar year with this application and indicate in section B the number and type of each form attached as part of this application. **If amendments or changes are made to the EIQ refer to the instructions in Section B.**

FORM OP - A03, "APPLICABLE REQUIREMENTS CHECKLIST"

Complete this form once for the facility. This form identifies all applicable requirements for the facility. Air quality rules that could apply to a facility or any emission unit within the facility are listed on the Applicable Requirements Checklist. Under the Missouri Operating Permit Program, the owner/operator of a facility is required to identify in the permit application all regulatory requirements (Federal, State, or Local) that apply; all "applicable requirements."

For each rule that applies to the facility, the owner/operator should mark a "✓" or "X" in the YES column. If a rule does not apply, mark a "✓" or "X" in the NO column. Then, in the space next to the NO column, enter the reason the rule does not apply. The program has identified a list of common reasons a rule may not apply to a source. To indicate one of these reasons, the owner/operator should write the letter abbreviation for the appropriate reason in the REASON space on the form. Reason K is a generic flag which may be used if none of the other specific reasons adequately explains the non-applicability of the rule. If K is selected, the reason for the rule's non-applicability must be explained on the General Comment Form.

SECTION A - GENERAL APPLICATION INFORMATION

Reasons Legend

Letter	Reason
A	This pollutant is not emitted by the facility.
B	The facility is not in this source category.
C	The facility is not in a special control or non-attainment area.
D	The facility is not in this county or specific area.
E	The facility does not have this emissions unit.
F	The facility does not use this fuel type.
G	This rule does not apply because no changes have been made at the facility that would trigger these procedural requirements.
H	This method/procedure is not used by the facility.
I	<i>Reserved</i>
J	This rule is for administrative purposes.
K	Other (explain on General Comment Form).

Local Agencies

The applicable requirement checklist includes the local regulations that apply to sources within the jurisdiction of the four local air pollution control programs within the State. The local air agencies are Kansas City, St. Louis City, St. Louis County, and Springfield-Green County. The local regulations may also be federally enforceable if the regulation is contained in the State Implementation Plan (SIP). Any questions pertaining to the local agency rules should be addressed to the specific local agency.

Enforceability

The level of government (i.e., state or federal) at which an air quality rule is enforced may vary. Some rules are enforceable only at the state or local agency level (Group II); others are only enforceable at the federal level (Group III). Some rules are enforceable at the local agency, state, and federal levels (Group I). Each owner/operator is required to comply with all applicable requirements no matter at which level the regulation is enforceable. All the rules have been placed into one of the three groups. Rule/regulations that are only enforceable by the federal government (Group III) are ones which have been rescinded by the State but are still in the State Implementation Plan (SIP) or have been finalized by EPA but not adopted by the State. An installation must designate which level of enforceable a rule/regulation is in their application. This is to guarantee a state only regulation doesn't become federally enforceable if placed in the wrong section of the operating permit.

Super Script Legend: Air Pollutants/Activities Covered by

1. Particulate Matter (TSP, PM₁₀)
2. Sulfur Oxides (SO_x)
3. Nitrogen Oxides (NO_x)
4. Volatile Organic Compounds (VOC)
5. Carbon Monoxide (CO)
6. Lead (Pb)
7. Other Regulated Pollutants except 1-6
8. Applies to an activity not a pollutant
9. All Regulated Pollutants
10. Other Pollutants
11. Hazardous Air Pollutants
12. Various criteria and non-criteria pollutants (check rule)

SECTION B - EMISSION INVENTORY

If your installation has not previously submitted the annually required Emission Inventory Questionnaire (EIQ) Forms, you need to obtain these forms and include two copies of completed EIQ under Section B of this application. Otherwise, you do not need to submit the EIQ.

Please note that on Form 2.0, "Emission Point Information," the shaded blocks are provided if you wish to calculate the potential emissions before any limitations on the potential are included.

Amendments or changes to previously submitted EIQ must be submitted at the same time as the operating permit application. The additional EIQ forms must clearly state that they are replacement or additional forms, and Part 9 of Form OP-A02 must be completed as follows:

mark the yes area like this, e.g., Yes ✓* (Check mark and asterisk), then complete the emissions inventory section for the pages being submitted with the application.

SECTION C - INSIGNIFICANT ACTIVITIES

If you are filing an application for an Intermediate or Basic State operating permit, do not complete the insignificant activities forms, Form OP - C01, Form OP - C02 or Form OP - C03. Applicants for Part 70 operating permits are, however, required to complete these forms.

General Information

Insignificant Activities include emission units which do not have a potential- to-emit in excess of the following **deminimis emission levels**, and for which no **specific** applicable requirement exists:

- the de minimis level for any hazardous air pollutant (HAP);
- 15 tons per year of particulate matter less than ten microns (PM₁₀);
- 40 tons per year of sulfur oxides (SO_x);
- 40 tons per year of nitrogen oxides (NO_x);
- 40 tons per year of volatile organic compounds (VOC);
- 100 tons per year of carbon monoxide (CO);
- 0.6 tons per year of Lead (Pb);

Note: The aggregate emissions from all insignificant activities for each pollutant category may exceed the de minimis levels. This is a change from the previous guidance. Previous guidance had said that the aggregate emissions for each pollutant category from insignificant activities could not exceed the de minimis levels - this is no longer the case.

FORM OP - C01, "INSIGNIFICANT ACTIVITIES NOT REQUIRED TO BE LISTED"

Complete Facility Name, County Number, Plant Number and Year Submitted.

Please check the appropriate line next to each activity which applies to your facility (Yes or No).

You do not need to calculate emissions from the insignificant activities and emission units listed on this form. Additional information concerning these activities/emission units are not required in the permit application.

FORM OP - C02, "INSIGNIFICANT ACTIVITIES REQUIRED TO BE LISTED"

Complete Facility Name, County Number, Plant Number and Year Submitted.

The activities/emission units listed on this form, are exempt from permitting requirements. However, for insignificant activities which are exempt because of size or production rate, a list of these activities must be included in the application. If the size or production rate exceeds that which is listed, Form OP-C03 should be completed provided that no **specific** applicable requirement exists.

Please check the appropriate box next to each activity which applies to your facility (Yes or No).

SECTION C - INSIGNIFICANT ACTIVITIES

FORM OP - C03, "LIST OF INSIGNIFICANT ACTIVITIES "

If an activity is not reported in the EIQ or on the Insignificant Activities Checklist, then the company should report the activity on the Insignificant Activity Form.

Complete Facility Name, County Number, Plant Number and Year Submitted.

Emission Unit Number: The identification number must coincide with the identification number assigned to this insignificant emission unit on all other forms used.

Number of Activities (Grouped): The number of activities associated with this emission unit. Certain insignificant activities or processes (emitting less than de minimis levels) may be grouped together and reported under one emission unit. The processes must be the same (or quite similar). Typically the emissions generated by each process are “small” or the processes are so similar that reporting them as distinct units adds little or nothing to this application.

Example: Two (2) printing presses can be reported as the same emission unit. The throughputs and maximum hourly design rates are added together for reporting purposes.

Estimated Amount of Emissions: Enter the amount of emissions in tons per year, for each pollutant(s) which could be emitted from the emission unit. The estimated emissions listed under the “other” category should be broken down and listed on the general comments page (OP-F01) if “other” is made up of more than one pollutant. The aggregate of all insignificant activity emissions listed on this form for each pollutant category may exceed the de minimis levels.

Description of Activity: Briefly describe the activity(ies) in the space below (type of activities, ratings, etc.). If this form does not give you sufficient space to describe your operations, attach the additional information on a Form OP-F01, "General Comments" or in a similar format as necessary.

SECTION D - EMISSION UNIT INFORMATION

FORM OP - D01, "EXISTING PLANT-WIDE PERMIT CONDITIONS"

Complete Facility Name, County Number, Plant Number and Year Submitted.

This form, Form OP - D01, is to be utilized by those Facilities which have **permit** conditions that are applicable to the entire Facility. These conditions will be applicable to multiple Emission Units and, in an effort to keep the paperwork to a minimum, **do not** include these permit conditions on each applicable Emission Unit Form. If there are none, you may leave this Form blank. **Do not include applicable requirements (regulations) which apply on a facility wide basis (see Form OP - D04).**

List the currently applicable plant-wide **permit** conditions which are currently applicable on a plant-wide basis (i.e. production is limited to 10,000 units per 12-month rolling average, or a limit on the hours of operation). Make sure to include the construction permit number where these limits were established.

List/describe the methodologies currently being utilized to demonstrate compliance with each of the existing plant-wide conditions (i.e. testing, monitoring, record keeping, periodic reporting, response to inspections, etc.).

FORM OP - D02, "PROPOSED PLANT-WIDE PERMIT CONDITIONS"

This form is intended for Intermediate Operating Permit Applications.

Complete Facility Name, County Number, Plant Number and Year Submitted.

List any proposed plant-wide conditions you wish to establish in this permit. It is these conditions which will keep your potential annual emissions under the Part 70 trigger levels. If there are no plant wide conditions you wish to establish, leave this form blank. These proposed conditions will normally be established to reduce the facilities potential emissions in order to opt out of Part 70 of the Title V requirements.

List any proposed plant-wide conditions which you want to establish on a plant-wide basis (i.e. production is limited to 10,000 units per 12 month rolling average, or limiting the hours of operation). List and describe the methodologies you intend to utilize to demonstrate compliance with each of the proposed plant-wide conditions (i.e. testing, monitoring, record keeping, periodic reporting, response to inspections, etc.).

FORM OP - D03, FORM OP - D04 & OP - D05, "EMISSION UNIT INFORMATION"

The three Emission Unit Forms, Form OP - D03, Form OP - D04 and Form OP - D05, contain all the required information that must be reported for each emission unit before a permit to operate can be issued. The Emission Points contained in the EIQ may need to be broken down into individual Emission Units by completing a separate Form OP - D03, Form OP - D04 and Form OP - D05. Emission Units are defined as:

Any part or activity of an installation that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Section 112(b) of the Act.

Emission Unit Information Forms must be completed for each individual piece of emitting equipment associated with an emission point, and source classification code, with the exception that some similar equipment which are subject to identical requirements may be grouped. In this case, the emission units may be reported together on the form, so long as, all individual equipment meets the following requirements:

- 1) all the equipment falls under the same SCC,
- 2) all the equipment has the same control measures (if controlled),

SECTION D - EMISSION UNIT INFORMATION

- 3) all the equipment is under the same permit or has the same permit conditions, and
- 4) the maximum design rate/capacity entered on the form is the combined maximum design rate/capacity for each piece of equipment being grouped.

The following information should be provided for each emission unit:

FORM OP - D03, "EMISSION UNIT INFORMATION"

Only complete Form OP-D03 when the emission unit(s) in question is not already identified in the EIQ, or when you wish to propose:

- 1) **an alternate operating scenario for the emission unit(s) in question, or**
- 2) **voluntary permit conditions for the emission unit(s) in question for purposes of reducing the potential emissions from this emission unit. This reduction in the potential emissions will normally be associated with your opting out of the Part 70, "Major Source" requirements.**

Unless you are proposing an alternate operating scenario and/or voluntary permit conditions, the only information that this form asks which isn't already in the EIQ is the date of manufacture for the emission unit. We'd prefer that you simply put this information in the EIQ, in the description field for that emission unit.

Complete Facility Name, County Number, Plant Number and Year Submitted.

Emission Point No., Emission Unit No., Source Classification Code (SCC):

The second row of Form OP - D03 contains information which ties the Emission Unit Form to a specific Emission Point (Form 2.0) in your EIQ.

D.1 - Emission Unit(s) Information:

Description of Unit(s), Manufacturer, Model No., Date of Manufacture, Stack ID(s). Briefly describe each individual piece of equipment reported under this Emission Unit(s). Most of this information should be readily available from your files. Record as accurately as possible the date this unit was manufactured. The date of manufacture is used to determine if any special regulations or performance standards apply to this equipment. **If units are grouped in this section, a range of model numbers and manufacture dates may be used.**

Make sure the Stack ID(s) reported here match the ones reported on the EIQ.

Maximum Design Rate/Capacity: Enter this value for each individual piece of equipment included in the Emission Unit(s). This is generally the rated design performance of the emission unit, and used to calculate potential to emit. Be sure to include units. Add all the Maximum Design Rate/Capacity values together and enter in the value in the totals box provided.

Check the appropriate response to indicate whether or not you intend to utilize this unit(s) in any alternate (flexible) operating scenario(s). If alternate scenarios are being requested, you will need to address them in Section D.2 of this form, Form OP - D03.

D.2 - Alternate Operating Scenarios:

General Information:

EPA defines "alternative operating scenarios" as "terms or conditions in a Part 70 permit which assure compliance with different modes of operation for which a different applicable requirement applies and

SECTION D - EMISSION UNIT INFORMATION

which the source is designed to accommodate”. In other words, alternate operating scenarios are necessary only if different modes of operation would change the method of documenting compliance. For example, the permitting authority would include an alternative operating scenario for a boiler that is subject to a different standard when burning coal versus gas, but would not include such a scenario for different coatings used on a coating line if they are all subject to the same VOC definition. A permit revision would not be needed for any coating that meets this VOC limit. The alternative operating scenario is not a way to impose specific permit restrictions for your facility.

As long as you identify in the application “reasonably anticipated alternative operating scenarios” you can switch among them without notifying the permitting authority. The only requirement is that you keep a log at the plant tracking when each mode of operating is in effect.

Keep in mind that if you plan to install a new unit even after you receive your Title V permit, you will need to apply for a state construction permit. Alternative operating scenarios do not allow a source to create “phantom scenarios” or “phantom emission units” to avoid permit review.

Instructions:

Describe the alternate operating scenarios, if any, you intend to use with this emission unit. The alternate scenario(s) must be identified and adequately explained in the space provided. If you need more space than is provided in the box, you will need to use Form OP- F01, "General Comments," or an attachment labeled as “EXHIBIT FORM OP - D03,” making sure to clearly identify that this is a continuation for a specific Alternative Operating Scenario(s) for this Emission Unit(s).

You will need to specify in Section D.5, Compliance Demonstration Methods on Form OP - D05, that this alternate operating scenario(s) can demonstrate compliance with all the Applicable Requirements in Section D.4 of FORM OP - D04 and any proposed Voluntary Permit Conditions contained in Section D.3 of Form OP - D03. If you are uncertain about getting approval for your proposed compliance demonstration, it would be wise to contact the Air Pollution Control Agency that will be processing your permit prior to submitting your completed application.

D.3 - Voluntary Permit Conditions:

Describe any new conditions you would like to place on the Emission Unit(s) for purposes of reducing the potential emissions from this Emission Unit(s). This reduction in the potential emissions will normally be associated with your opting out of the Part 70 permit requirements.

These proposed new conditions must be listed in the space provided and will become a federally enforceable operating condition in the permit issued for the installation. You will need to specify in Section D.5 on Form OP - D05 how compliance with the new condition(s) will be demonstrated.

If you are uncertain about getting approval for your proposed compliance demonstration, it would be wise to contact the Air Pollution Control Agency that will be processing your permit prior to submitting your completed application. If you need more space than is provided in the box, you will need to use Form OP-F01, "General Comments" or an attachment labeled as “EXHIBIT FORM OP - D03,” clearly marking that this is a continuation of the Voluntary Permit Conditions for this Emission Unit(s).

Condition(s) Requested, Description: Briefly list and describe the manner in which the requested voluntary condition will limit the potential emissions from this Emission Unit(s).

Limitation, Pollutant Controlled: Enter the specific emission limitation and the pollutant which will be controlled as a result of complying with the voluntary condition for this Emission Unit(s).

SECTION D - EMISSION UNIT INFORMATION

The general comments' page (OP-F01) can be used to supply additional information that can't be included in the provided space.

FORM OP - D04, "APPLICABLE REQUIREMENTS"

(Note: OP - D05 is usually required for each Applicable Requirement reported on OP - D04.)

Plant-wide:

If an emission unit is subject to plant-wide permit condition(s), report these conditions on Form OP - D01.

Applicable requirements that apply to the entire plant as a whole [i.e., requirements that apply identically to all emission units at a facility (e.g., plant-wide opacity limits)] should be reported on OP - D04. Plant-wide can be used as an identification number in the Emissions Point/Unit Column.

The list below will help you to determine what "facility-wide" applicable requirements your facility must comply with. Please be advised that you must include any facility-wide applicable requirement that may not be addressed in the list.

Facility-Wide Applicable Requirements				
Chapter 2	Chapter 3	Chapter 4	Chapter 5	Chapter 6
10 CSR 10-2.100	10 CSR 10-3.030	10 CSR 10-4.030	10 CSR 10-5.050	10 CSR 10-6.030
10 CSR 10-2.030	10 CSR 10-3.050	10 CSR 10-4.060	10 CSR 10-5.070	10 CSR 10-6.050
10 CSR 10-2.060	10 CSR 10-3.080	10 CSR 10-4.070	10 CSR 10-5.090	10 CSR 10-6.060
10 CSR 10-2.070	10 CSR 10-3.090	10 CSR 10-4.090	10 CSR 10-5.120	10 CSR 10-6.065
10 CSR 10-2.150	10 CSR 10-3.100	10 CSR 10-4.140	10 CSR 10-5.130	10 CSR 10-6.110
10 CSR 10-2.160	(except 3B, 4)	10 CSR 10-4.150 (except 4)	10 CSR 10-5.150 (except 3B, 3C)	10 CSR 10-6.130
			10 CSR 10-5.160	10 CSR 10-6.140
			10 CSR 10-5.250	10 CSR 10-6.150
			10 CSR 10-5.290	10 CSR 10-6.170
			(if applicable)	10 CSR 10-6.180
			10 CSR 10-5.120	10 CSR 10-6.210
				10 CSR 10-6.230
				10 CSR 10-6.250

Complete Facility Name, County Number, Plant Number and Year Submitted.

D.4 - Applicable Requirements:

List all the applicable requirements placed on the emission unit, or which apply plant-wide if this form is being used to identify plant-wide applicable requirements. Applicable requirements are Federal, State and Local Rules and Regulations and any condition(s) contained in a current permit which limit(s) the operation of the Emission Unit beyond any regulatory requirements (an example of a permit condition would be a limit on the hours of operation of the Emission Unit).

The Emission Limit or standard specified in this block should only reflect the allowable emission rate required by the Requirement(s). See the definition of the "allowable emission rate" in the glossary for a more detailed discussion of this topic.

You are responsible for determining what regulations and conditions, if any, apply to plant-wide and to each individual Emission Unit. If you are unsure, it would be advisable to contact the appropriate Air Pollution Control Agency or Technical Assistance Program for assistance.

SECTION D - EMISSION UNIT INFORMATION

If you need more space than is provided in the box, you will need to use Form OP- F01, "General Comments" and/or an attachment labeled as "EXHIBIT FORM OP - D04," clearly marking that this is a continuation of the Applicable Requirements for this Emission Unit(s).

Emission Point/Unit No: This column contains information which ties the Applicable Requirements Form to a specific Emission Point (Form 2.0) in your EIQ and Form OP - D03. Enter the identical information on this form as appearing on Form 2.0 of the EIQ and Form OP -D03. If the emission unit is subject to standards for more than one pollutant, list the emission unit again on a separate line and complete the table for each individual pollutant.

Pollutant: List the pollutant which is subject to a specific requirement or condition.

Applicable Requirement Authority, Cite Regulation or Condition: (CSR #, CFR #, Permit No., etc.): List the code (Source and Number) of the specific requirement or condition which applies to the Emission Unit(s). The requirements can be a regulation from 40 CFR part 60, a State regulation, or a permit condition. Please be specific when listing the requirement.

Emission Limit or Standard and Units: Enter the emission limit or standard and units that apply to this emission unit due to the regulation or condition. This can be an allowable emission rate, an opacity limit, a limit on the hours of operation of the emission unit(s).

Compliance Demonstration Method: Indicate the method of compliance (testing, monitoring, recordkeeping, and reporting or other considerations you used to make compliance determination) required by the specific permit or regulation. Compliance for state only regulations, e.g., odor, fugitive emissions, may be demonstrated by records of agency inspections. In these cases, Form OP - D05 is not required. See Air Pollution Control Program Policy for acceptable compliance demonstration methods for opacity regulations.

If the emission unit currently is failing to meet an applicable requirement, an "Emission Unit Compliance Plan Form" Form OP-E01, Compliance Plan/Status, must be completed and attached to the Emission Unit Form. This additional form delineates what provisions are not being met, the steps you will take to bring the Emission Unit(s) into compliance with those provisions, the interim dates for demonstrating progress towards achieving compliance and the frequency of submission of progress reports.

FORM OP - D05, "COMPLIANCE DETERMINATION METHODS".

(Note: OP - D05 is usually required for each Applicable Requirement reported on OP - D04.)

Complete Facility Name, County Number, Plant Number and Year Submitted.

Emission Point No., Emission Unit No., Applicable Requirement: The second row of Form OP - D05 contains information which ties the Compliance Determination Methods Form to a specific Emission Unit on Form OP - D04. Enter the identical information on this form as appearing on Form OP - D04.

D.5 - Compliance Demonstration Methods:

Describe the methods to be utilized to demonstrate compliance with the Applicable Requirements and any proposed Voluntary Conditions being established in this permit application. Indicate the basis of your compliance method by checking applicable requirements or gap-filling. Gap-filling indicates that the source has proposed a compliance method which has to be approved as part of the permit application.

SECTION D - EMISSION UNIT INFORMATION

You must specify all the current methodology you utilize to insure compliance with Applicable Requirements and conditions for the Emission Unit(s). These methodologies include all testing, monitoring, record keeping and reporting requirements as well as any additional methods established by Applicable Requirements or special permit conditions to which the Emission Unit(s) is subject. If an applicable requirement does not specify exactly what you must do to show compliance, you may propose practices that are appropriate to the Emission Unit(s).

For proposed Voluntary Conditions you will need to submit a methodology which will insure that compliance with the condition can be demonstrated (i.e. if hours of operation, a logbook for recording the hours could be utilized. For other proposed conditions testing or monitoring might be the appropriate methodology). You are responsible for insuring that these methods can be approved. If you are uncertain about getting approval for your proposed methodology, it would be wise to contact the Air Pollution Control Program that will be processing your permit prior to submitting your completed application.

For alternate operating scenarios you will need to submit methodology demonstrating that under this proposed operating scenario no applicable Rule, Regulation, Permit Condition or proposed Voluntary Condition will be violated. If you are uncertain about getting approval for your proposed compliance demonstration, it would be wise to contact the Air Pollution Control Agency that will be processing your permit prior to submitting your completed application.

If you need more space than is available you may need to use Form OP - F01, General Comments and/or an attachment labeled as EXHIBIT FORM OP - D05 to provide the additional information. Whichever method is used to provide the additional information, the new page must be clearly marked that this is a continuation of Section D.5, Compliance Demonstration Methods for this Emission Unit(s). Sample sheets can be attached to the application which will demonstrate the proposed recordkeeping and reporting methods.

Plant-wide requirements that use agency inspections as compliance determination do not require Form OP - D05.

Testing:

Date: Fill in the date of the test performed.

Test Method: List the specific test methods and procedures that are spelled out in the rule or regulation that applies to the emission unit(s).

Firm: Enter the name of the company or entity that actually performed the test.

Operating Conditions: Briefly describe the operating conditions under which testing is conducted during periods of representative conditions at the maximum process/production rates, not to include periods of startup, shutdown, or malfunction. These conditions are to include all relevant process/production parameters as well as all parameters relating to the status of emission controls existing during the test.

Summary of Results: Summarize the test results.

SECTION D - EMISSION UNIT INFORMATION

Recordkeeping:

List parameters on which records are being maintained, the frequency of records (hourly, daily, etc.) and the length of time records are retained from the date of entry. For each recorded parameter include the method of measurement.

Monitoring:

Monitor Device Type: Describe the emission monitoring device used.

Location Description: Specify the location of the measurement device or the point of sampling or measurement.

Pollutant(s) being Monitored: List the pollutant which is being monitored.

Sampling Frequency: The data acquisition frequency, how often data is collected by the monitoring device. It may be continuous or it may be other than continuous such as daily, every three hours, hourly, etc.

Duration of Sampling: Duration or length of data collection period.

How Data Will be Reported: Provide information indicating how monitoring data will be reported (electronically, paper type, or some other means).

Reporting:

Describe all reporting requirements and provide the title and frequency of report submittals to the agency.

SECTION E - COMPLIANCE PLAN, STATUS AND CERTIFICATION

FORM OP - E01, "COMPLIANCE PLAN/STATUS"

COMPLETION OF THIS FORM OF THE OPERATING PERMIT FORMS PACKAGE IS MANDATORY FOR ALL SOURCES.

Complete Facility Name, County Number, Plant Number and Year Submitted.

COMPLETE THIS FORM ONCE FOR EACH APPLICATION.

This form delineates what provisions are not being met, the steps you will take to bring the Emission Unit(s) into compliance with those provisions, interim dates for demonstrating progress towards achieving compliance and the frequency of submission of progress reports.

After identifying each requirement for sources that are not in compliance, you will be given the opportunity to propose a plan for coming into compliance and a schedule for measuring your progress toward that goal.

FORM OP - E02, "COMPLIANCE CERTIFICATION STATEMENT"

The regulation pertaining to this section can be found in 10 CSR 10-6.065 (6) (B) 3.j.

Complete Facility Name, County Number, Plant Number and Year Submitted.

The general comments page (OP-F01) can be used to supply additional information that cannot be included in the provided space.

E.1 - Compliance certifications must be submitted annually, unless an applicable requirement listed in Section D requires that compliance certification must be submitted on a more frequent basis. For example, NSPS regulations may require compliance certification for affected facilities on a semiannual or quarterly basis.

E.2 - If your facility is in compliance with enhanced monitoring and compliance certification requirements when the operating permit is submitted, check "yes" and go to Section E.3 below.

If the installation is not in compliance with the enhanced monitoring and compliance certification requirements when the operating permit application is submitted, check the line before "no". In the space provided explain what requirements have not been met.

E.3 - A responsible official must sign the compliance certification. Please see the glossary for the definition of "responsible official." Your permit application must include a description of monitoring, recordkeeping, reporting, and test methods required to track compliance. The responsible company official is required to certify to the truth, accuracy, and completeness of the compliance certification. The certification must state that :

“Based on information formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete”

If you are unable to certify that an emissions unit is in compliance with an applicable requirement, you will need to include a schedule of compliance for the emissions unit in question in a compliance plan.

SECTION E - COMPLIANCE PLAN, STATUS AND CERTIFICATION

The definition of responsible company official means, for most facilities, that the compliance certification must be made by the plant manager or a more senior corporate official. In fact, at some locations, the plant manager can only make the certification if delegation of authority to the plant manager is approved in advance by the permitting authority. Eligible parties to make the compliance certification include:

- a corporate officer
- a person in charge of a principal business function (e.g., a general manager), or
- a plant manager, provided that the plant has at least 250 employees or \$25 million in sales or expenditures (in 1980 dollars) or authority has been delegated.

Knowingly falsifying any certification is a felony under the CAA; therefore, responsible company officials must take care in preparing the certification, and must ask the proper questions to ensure the accuracy and completeness of the compliance certification.

SECTION F - GENERAL COMMENTS AND COMPLETENESS CHECKLIST

FORM OP - F01, "GENERAL COMMENTS"

Complete Facility Name, County Number, Plant Number and Year Submitted.

Please make sure that every time a Form OP - F01, General Comments is used, Point/Unit No. information is provided to reference this comment page back to the Emission Unit(s). Additional identifications may also be needed if the comment form is used to provide information on Alternative Operating Scenarios (as EXHIBIT FORM OP - D05, SECTION D2), Compliance Demonstration Methods or other Compliance Information (as EXHIBIT FORM OP - D05).

FORM OP - F02, "COMPLETENESS CHECKLIST"

Complete Facility Name, County Number, Plant Number and Year Submitted.

The Completeness Checklist is composed of five sections: Section A - General Application Information, Section B - Emission Inventory, Section C - Insignificant Activities, Section D - Emission Unit Information and Section E - Compliance Certification. Each section is divided into subsections (parts) which contain individual items of information that should be included in the application. To aid in tracking deficiencies, Checklist Line Numbers labeled "Y" and "N" are provided to the right of each item in a subsection (part), to indicate whether or not the information is contained in the application. If there is a space labeled "NA" (not applicable) next to an item, or the subsection (part), then the item(s) are not specifically required to be included in the application. Spaces are provided to check the overall completeness or appropriateness of the information requested in a particular part. The completeness of each part can be indicated by putting a check mark - \checkmark on the "Completed" checklist line at the end of each part.